

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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STERLING D. BROWN,

Plaintiff,

v.

Case No. 18-CV-922

CITY OF MILWAUKEE,  
CITY OF MILWAUKEE CHIEF OF  
POLICE ALFONSO MORALES, in his  
Official capacity,  
SERGEANT SEAN A. MAHNKE,  
SERGEANT JEFFREY S. KRUEGER,  
OFFICER JOSEPH J. GRAMS,  
OFFICER BOJAN SAMARDZIC,  
OFFICER JAMES P. COLLINS,  
OFFICER CRISTOBAL MARTINEZ AVILA,  
OFFICER ERIK A. ANDRADE, and  
OFFICER JASON P. JENSEN,

Defendants.

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**OFFER OF JUDGMENT PURSUANT TO FED. R. CIV. P. 68**

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To: Mr. Sterling D. Brown  
c/o Atty. Mark Thomsen  
Gingras Thomsen & Wachs SC  
3228 Turnberry Oak Dr. – Ste. 210  
Waukesha, WI 53188

Please take notice that the above named Defendants, offer to allow judgment against the City of Milwaukee in the amount of \$400,000, inclusive of all costs and attorney fees accrued through the date upon which this Offer was served, in satisfaction of all Plaintiff's claims against all of the named Defendants. Nothing in this Offer shall be construed as an admission of liability on behalf of any Defendant. To the contrary, this Offer is made in the interest of judicial

economy to the Court, the parties, and their attorneys. This offer is made pursuant to Fed. R. Civ. P. 68(a).

Dated at Milwaukee, Wisconsin this 24th day of September, 2019.

GRANT F. LANGLEY  
Milwaukee City Attorney



NAOMI E. GEHLING  
Assistant City Attorney  
State Bar No. 1061388  
Attorneys for Defendants

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